

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
MCALLEN DIVISION

United States District Court
Southern District of Texas
FILED

OCT 03 2024

Nathan Ochsner, Clerk

ROSALINDA MAGANA AND
ARTURO MAGANA-PAREDES

v.

TRISMART SOLAR LLC,
JUAN WINSTON CURLING,
FRONTLINE HOME SOLUTIONS LLC,
and SUNLIGHT FINANCIAL, LLC,

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CIVIL ACTION NO. 7:24-cv-00384

JUAN WINSTON CURLING'S ORIGINAL ANSWER

TO THE HONORABLE UNITED STATES DISTRICT JUDGE:

Defendant, Juan Winston Curling, files this Original Answer to Plaintiffs' Amended Petition. Pursuant to Federal Rule of Civil Procedure 8(b), Defendant denies each and every allegation contained in Plaintiffs' Amended Petition except for those expressly admitted herein. In several instances, Defendant has identified statements in the Original Complaint that are legal conclusions or non-factual statements rather than factual assertions. No response to such legal conclusions or non-factual statements is required. However, if such response is required, Defendant denies such legal conclusions and non-factual statements. The headings and numbered paragraphs below directly correlate to the sections and numbered paragraphs of Plaintiffs' Amended Petition. Those titles and headings are reproduced in this Original Answer for organizational purposes only, and Defendant does not admit any matter contained in them.

Defendants respond to the specifically numbered allegations of the Complaint as follows:

1. Defendant lacks sufficient knowledge to admit or deny the allegations contained in this paragraph.

2. Defendant lacks sufficient knowledge to admit or deny the allegations contained in this paragraph.

3. Defendant lacks sufficient knowledge to admit or deny the allegations contained in this paragraph.

4. Admit.

5. Admit.

6. Defendant lacks sufficient knowledge to admit or deny the allegations contained in this paragraph.

7. Defendant lacks sufficient knowledge to admit or deny the allegations contained in this paragraph.

8. Defendant lacks sufficient knowledge to admit or deny the allegations contained in this paragraph.

9. Defendant lacks sufficient knowledge to admit or deny the allegations contained in this paragraph.

10. Deny.

11. Deny.

12. Deny.

13. Defendant lacks sufficient knowledge to admit or deny the allegations contained in this paragraph.

14. Defendant lacks sufficient knowledge to admit or deny the allegations contained in this paragraph.

15. Deny.

16. Deny.

17. Deny.

18. Deny.

19. Deny.

20. Deny.

21. Deny.

22. Deny.

23. Deny.

24. Deny.

25. Defendant lacks sufficient knowledge to admit or deny the allegations contained in this paragraph.

26. Defendant lacks sufficient knowledge to admit or deny the allegations contained in this paragraph.

27. Defendant lacks sufficient knowledge to admit or deny the allegations contained in this paragraph.

28. Defendant lacks sufficient knowledge to admit or deny the allegations contained in this paragraph.

29. Deny.

30. Defendant lacks sufficient knowledge to admit or deny the allegations contained in this paragraph.

31. Deny.

32. Deny.

33. Deny.


34. Cannot admit or deny as this is a statement.

35. Deny.

PRAYER

For the foregoing reasons, Defendant asks the Court to enter judgment that Plaintiffs take nothing, dismiss Plaintiffs' suit with prejudice, assess costs against Plaintiffs, and award Defendant all other relief that the Court deems appropriate.

Respectfully submitted,


Juan Winston Curling, Defendant
Pro Se

CERTIFICATE OF FILING AND SERVICE

I hereby certify that on this 3rd day of October 2024, a true and complete copy of the above and foregoing document was served on the following via electronic mail:

Melissa Sue Gutierrez
Bradley Arant Boult Cummings
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Juan Winston Curling, Defendant
Pro Se